

MEMORANDUM ENDORSED

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September 29, 2022

**VIA ECF**

The Honorable Gregory H. Woods  
U.S. District Court, Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Courtroom 12C  
New York, New York 10007

RE: *Mt. Hawley Insurance Company v. Spring Mountain Vineyard, Inc.*  
1:22-cv-03191-GHW; Request for Extension for Discovery (Docket #51)

Dear Your Honor:

Plaintiff Mt. Hawley Insurance Company ("Mt. Hawley") writes in response to the Court's September 28, 2022 Order (Dkt. #58), which required Mt. Hawley to articulate whether Defendant Spring Mountain Vineyard, Inc. ("SMV") consented to Mt. Hawley's request to extend its time to respond to SMV's motion to dismiss (Dkt. #51) from October 14, 2022 to November 14, 2022. Unfortunately, SMV would not consent to Mt. Hawley's request without proposing several conditions, including: (i) discovery-related limitations and restrictions; and (ii) an extension of the case deadlines. Those conditions are neither acceptable nor germane to Mt. Hawley's straightforward request for additional time for an opposition. We therefore request that the Court grant Mt. Hawley's application to extend its time to file opposition to SMV's motion to November 14, 2022. Of course, Mt. Hawley has no objection should SMV request a reasonable extension of time to file a reply.

Respectfully Submitted

*s/Michael D. Prough*

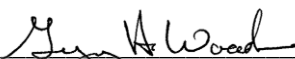
Michael D. Prough

cc: All Counsel via ECF

Application granted in part and denied in part. Plaintiff's opposition is due no later than October 28, 2022. Defendant's reply, if any, is due within seven days after service of Plaintiff's opposition.

SO ORDERED.

Dated: September 29, 2022  
New York, New York

  
GREGORY H. WOODS  
United States District Judge